

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Cushmir McBride

Case No. 21-485-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Oct. 28, 2020 through Mar. 2, 2021 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. 844(n)

Offense Description

Conspiracy to maliciously damage property used in interstate commerce by
means of an explosive

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet./s Joseph Mangoni*Complainant's signature*Joseph Mangoni*Printed name and title*

Sworn to before me and signed in my presence.

Date: Mar. 19, 2021/s Timothy R. Rice*Judge's signature*City and state: Philadelphia, PAHon. Timothy R. Rice, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR ARREST WARRANTS**

I, Joseph Mangoni, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF) and have been since September 2001. During my career, I have been assigned to various investigative groups, to include the following, all in Philadelphia, PA: Firearms Trafficking Task Force; Violent Crime Impact Team, High Intensity Drug Trafficking Area (HIDTA) Task Force; Firearms Enforcement Group and the Crime Gun Intelligence Group (CGIC). Currently, I am assigned to the ATF Philadelphia Arson and Explosives (A&E) Task Force, which is a task force consisting of ATF Special Agents, Philadelphia Police Department (PPD) Detectives and Philadelphia Fire Department (PFD) Fire Marshal's Office (FMO) investigators. One of the Task Force's purposes is to investigate the illegal possession, use or transfer of "illegal explosive devices" or "improvised explosive devices (IED)". I am also a part-time member of the ATF National Response Team (NRT), which investigates large-scale fire and explosive incidents around the country. I have conducted or participated in hundreds of investigations relating to potential violations of the federal firearms, narcotics and tax laws. Since October 2017, I have been assigned to numerous arson and explosive investigations in both the Philadelphia, Pennsylvania area and around the United States.

2. I make this affidavit in support of an application for arrest warrants for Kamar THOMPSON and Cushmir McBRIDE for violations of Title 18 U.S.C. § 844 (n) (conspiracy to use explosives to damage property which affects interstate commerce).

3. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that Kamar THOMPSON, Cushmir McBRIDE and Person #1 have conspired to use explosives to maliciously damage Automated Teller Machines (“ATMs”) in violation of Title 18 U.S.C. §§ 844(i) and (n). The information contained in this affidavit is known to me personally or has been relayed to me by other law enforcement officers, or individuals assisting law enforcement. Because this affidavit is being submitted for the limited purpose of securing arrest warrants, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to obtain the requested warrants.

OVERVIEW

4. ATF’s Arson and Explosives Task Force has been investigating a significant number of Automated Teller Machine (ATM) Explosions. Specifically, investigators became aware of ATM explosions committed by a group of individuals using the same methods and wearing vests and hard hats typically used in construction work. The targeted ATMs were located inside Wawa convenience stores, a Target retail store, and two (2) freestanding Wells Fargo Bank ATMs. The perpetrators of these crimes have blown up seven (7) machines using an “M-type” illegal explosive devices to steal the money contained in the machine. The individuals worked together to successfully breach the safe of the ATM and steal money at least four times, resulting in losses more than \$400,000.

5. Wawa is a convenience store that offers built-to-order foods, beverages, coffee, fuel services, and surcharge-free ATMs. Wawa has stores located in Pennsylvania, New Jersey, Delaware, Maryland, Virginia, Florida, and Washington, D. C. All ATMs housed in Wawa stores discussed below were owned by PNC Bank.

6. Target Corporation is a Minneapolis, Minnesota based retailer with stores throughout the United States. The ATM destroyed in the Target store, described in more detail below, was owned by Capital One Bank.

7. Wells Fargo and Company is a diversified, community-based financial services company with over seven thousand locations throughout the United States, which owns and operates over 13,000 ATMs.

8. Wawa, Target, PNC, Capital One Bank, and Wells Fargo, are all businesses which, at the time these ATMs were destroyed with explosives, were engaged in and affecting interstate commerce by providing customers with goods, services and currency, from states other than the Commonwealth of Pennsylvania. Through my training and experience, I am aware that ATMs, such as those discussed in this affidavit, are devices that hold United States currency that may be accessed by a user through electronic telecommunications from the ATM to an ATM users' financial institution to enable the user to obtain and in some machines deposit currency. The ATM's rely on electronic interstate communications to perform their functions of receiving, documenting, and disbursing funds, and thus are devices that are engaged in and affect interstate commerce.

9. The illegal explosive devices used in the crimes committed in this investigation are also known as "M-type Devices." These devices range from an M-80 to an M-1000. M-1000s are commonly referred to as a "quarter or half stick of dynamite." These devices generally consist of a heavy cardboard tube, sealed at both ends, filled with an explosive material with a piece of hobby fuse inserted into the tube. The devices function by applying an external heat source, such as a match or flame, to the fuse. The most common energetic material found inside the devices is flash powder, a perchlorate/chlorate chemical explosive mixture. These

devices carry enough explosives to cause serious bodily injury and in certain cases death. The devices are not legally manufactured, sold, or imported in the United States and are classified as Illegal Explosive Devices under federal law.

10. The individuals and locations discussed in the following paragraphs do not comprise a complete list of all the suspects and locations involved in the criminal activity that have been identified as part of this investigation. Rather, the individuals discussed below merely constitute the focus of this affidavit.

Cushmir McBRIDE and Person #1

11. Cushmir McBRIDE also known as “Cushmar McBRIDE,” is a 21-year old male, who according to his Pennsylvania Identification Card lives 401 South Union Avenue, in Yeadon, Pennsylvania. This address is, however, the location of the Yeadon Community Park, which is identified as 401-523 S. Union Avenue. McBRIDE’s family has used 406 S. Union Avenue, Yeadon, Pennsylvania, for many years as their address, which I confirmed is a residence. I also learned that McBRIDE has a grey, 2013 Nissan Altima, Pennsylvania License Plate LLG-9664 registered to him with at 401 South Union Avenue. During this investigation, agents saw that car parked in front of an apartment building where was McBRIDE was observed on video. (See paragraphs 54-55). Agents later searched an apartment in that building and recovered documents relating to THOMPSON. Based on the records I reviewed, McBride is not employed and had no reported income or wages during 2020.

12. As part of this investigation, we obtained police reports related to McBRIDE, and Person #1. Most of the police reports were obtained from the State of Delaware and police departments (PD) located in Delaware County, Pennsylvania. These PDs include the Yeadon Police Department, the Upper Darby Police Department, and the

Upper Chichester Township Police Department. There reports provided valuable information that demonstrated connections between Cushmir McBRIDE and Person #1, which include, but are not limited to the following:

- On December 13, 2015, the Yeadon Police Department (YPD) was dispatched to 406 S. Union Avenue for a report of a missing person. Officers were met by Tracy Tidwell, who reported her son Cushmir McBRIDE missing.
- On February 16, 2017, Kenneth Hilliard of 6015 W. Thompson Street, in Philadelphia, Pennsylvania, filed a police report. In the report, Hilliard indicated his stepfather, Rubin Tidwell lives at 406 S. Union Avenue, along with Hilliard's mother, Tracy Tidwell.
- On September 5, 2017, the Upper Darby PD conducted a vehicle investigation where Cushmir McBRIDE and Person #1 were driving in a vehicle together. According to the report, McBRIDE was arrested during the incident for providing false information to law enforcement.
- On April 19, 2018, the Upper Darby PD conducted a vehicle investigation where Cushmir McBRIDE was in a black Acura, owned by Tracy Tidwell.
- On December 28, 2018, the Upper Darby PD contacted Cushmir McBRIDE during another vehicle investigation, inside a black 2014 Chevrolet owned by Tracey Edmondson-Tidwell.
- According to court records, the Delaware State Police reported that on October 1, 2019, Person #1 was investigated driving in a black 2014 Chevrolet Impala, PA License Plate KZL-2422 owned by Tracy Tidwell (McBRIDE's mother). According to the police report, phone number 267-624-8580 is listed for Person #1. This is the same vehicle that Cushmir McBRIDE was in when the Upper Darby PD investigated him in December 2018.
- On November 14, 2019, the Delaware State Police investigated Person #1 while driving a red 1996 Honda Accord, DE License Plate XP709426. According to that police report, phone number 267-624-8580 is listed for Person #1.
- On December 2, 2019, the Yeadon PD conducted a vehicle investigation of a vehicle driven by Cushmir McBRIDE and owned by Tracey Tidwell.

The information in these reports established that from as far back as 2017, McBRIDE and Person #1 were closely associated, that Person #1 used phone number 267-624-8580, and that McBRIDE was related by blood or marriage to Kenniyah Hilliard, who lives at 2820 Chichester Avenue, in Upper Chichester, Pennsylvania. This location is where

THOMPSON's car was found after the November 5, 2021, Wawa incident, described as Scene #5. (See paragraph 40-41). Hilliard and McBride also travelled together and were in contact by phone. (See paragraph 70).

13. On September 25, 2020, the Upper Chichester Police Department responded to a report of a burglary at the Boothwyn Court Apartments, located at 2820 Chichester Avenue, in Upper Chichester, Pennsylvania. During the burglary investigation, police contacted Kenniyah Hilliard from Apartment D-9. Hilliard provided the police her contact number of 484-479-4916. This apartment complex is where Kamar THOMPSON's gold Chevrolet Malibu was recovered by police on November 6, 2020. (See paragraphs 43).

Kamar THOMPSON

14. Kamar THOMPSON, also known as Kamar Marshall, is a thirty-four (34) year-old male. THOMPSON was living at 601 Magee Avenue, First Floor, in Philadelphia, Pennsylvania, prior to his arrest by Philadelphia Police on January 28, 2021. This address is his address of record on his Pennsylvania Driver's License. THOMPSON has two felony convictions, both for firearms offenses. On January 29, 2021, I arrested THOMPSON based on a federal complaint that charged him with one count of possession of ammunition by a felon. On February 23, 2021, THOMPSON was charged by indictment with two counts of violating Title 18 U.S.C. 922 (g) (1) (possession of a firearm and ammunition by a felon). THOMPSON has been in federal custody since January 29, 2021. Employment queries for THOMPSON show that he has no current employment or current wages and has not had any reported income or wages since late 2019.

15. On December 3, 2020, ATF investigators surreptitiously placed a stationary, visually recording, surveillance platform around 601 Magee Avenue, Philadelphia, Pennsylvania. The video recorder was set up to record the outside property and curtilage of 601 Magee Avenue, the residence of Kamar THOMPSON. The surveillance platform recorded, among other things, the presence of a black Chevrolet Impala, PA License Plate LJT-0914. Between December 3, 2020 and January 28, 2021, investigators observed Kamar THOMPSON coming and going from 601 Magee Avenue and the black Chevrolet Impala multiple times. We observed THOMPSON driving the vehicle and using it to store items that THOMPSON would retrieve and bring into his house.

16. On January 24, 2021, Philadelphia Police Department Officers (PPD) responded to a reported burglary at 601 Magee Avenue, Philadelphia, Pennsylvania. When they arrived, the officers were met by Kamar THOMPSON who reported that unknown persons entered his house without permission and stole a PlayStation 5, a laptop and clothing valued at \$2,900. THOMPSON provided his cell number as 267-881-6008. I believe, based on the investigation, that this number is a different number than the number THOMPSON was using while he conspired with others to use explosive to break into ATMs.

17. A check of PPD records showed that on January 1, 2020, a female victim of assault reported that her ex-boyfriend, Kamar THOMPSON, physically assaulted her and stole her belongings and her vehicle. On January 4, 2020, PPD Officers arrested THOMPSON at his residence, 601 Magee Avenue, in Philadelphia, for Aggravated Assault, Robbery and other charges.

FIREARMS AND AMMUNITION INVESTIGATION

18. On January 28, 2021, PPD Officer Sean Burgess, assigned to the Philadelphia Police Department's 2nd District was working in full uniform in a marked police car with his partner when they became aware of a bench warrant for Kamar THOMPSON. While in the area investigating his residence of record, officers observed a black Chevrolet Impala, later found to be bearing Pennsylvania License Plate LJT-0914, pull up and park in front of 600 Magee Avenue. The officers observed a male they recognized as THOMPSON leave the vehicle and go up the stairs to the front door of 601 Magee Avenue and enter the residence. Law enforcement observed THOMPSON carrying a satchel type bag slung around his shoulder when he got out of the black Impala. The officers got out of their car, knocked on the exterior door and were invited into a common vestibule area by someone other than THOMPSON. The Officer yelled "hello" into the first-floor apartment door, which was open. A male voice answered "here." Officer Burgess entered the apartment and saw THOMPSON standing inside with the satchel bag still around his shoulder. The officer, knowing there was a bench warrant for THOMPSON, placed him into custody. PPD officers then searched THOMPSON, incident to his arrest. During the search of THOMPSON, officers found a Glock .45 caliber magazine loaded with six (6) live .45 caliber rounds of ammunition inside the satchel bag. Also located in the satchel, was a stack of \$20 bills with a rubber band around it totaling \$1,340, a Red Apple iPhone and a wallet with his Pennsylvania Identification Card. They did not find a firearm inside the satchel.

19. The license plate on the black Chevrolet Impala that the officers saw THOMPSON driving was not registered, in that there was no record found for the car. In accordance with PPD policy, the car, pursuant to 75 Pa. CSA. § 6309.2, was impounded. During the required inventory they conducted before it was to be towed, the officers saw an H&R, .22

caliber revolver, Model Young America Double Action, with unknown serial number loaded with six (6) rounds of .22 caliber ammunition in the center console. The officers provided this firearm, along with a large set of keys on a key ring recovered during THOMPSON's arrest to ATF at our request. The officers also observed large bags of clothes and multiple cellular phones in the vehicle. Officers held the car for a pending federal search warrant. The subject vehicle was then taken to a secure law enforcement facility. A federal search warrant was obtained for the Impala (See paragraph 22).

20. Following the events described above, law enforcement obtained a search warrant for 601 Magee Avenue, in Philadelphia. On January 28, 2021, members of PPD Major Crimes and ATF agents searched 601 Magee Avenue, First Floor Apartment, in Philadelphia, for evidence of firearms violations. During the initial entry into the residence, ATF investigators observed that THOMPSON's residence was in disarray and appeared to have been ransacked prior to their search. During the search, a Glock, .45 caliber semi-automatic pistol, Model 39, bearing serial number HCM237, loaded with eleven (11) rounds of ammunition was recovered in the rear bedroom of the apartment inside the top drawer of a small piece of furniture. The firearm is listed in NCIC in stolen status. Additionally, one (1) .32 caliber round of loose ammunition was recovered on the living room floor of the residence. The search did not produce any .32 caliber firearms. I also note that the loaded magazine recovered by PPD officers in THOMPSON's satchel bag is a Glock magazine, which matches the type of firearm officers found in the bedroom. Investigators found and documented a pair of sneakers in THOMPSON's residence that are similar in color and design to those seen worn by a suspect in surveillance video of an explosives' incident at a Target store on October 28, 2020. These

sneakers were documented and not seized because they were outside the scope of the warrant for this residence (See below photo).



21. On January 28, 2021, officers recovered one red Apple I-phone from THOMPSON's satchel bag. The officers reported seeing cell phones in THOMPSON's vehicle. These phones were later recovered during a search of THOMPSON's vehicle. (See paragraph 22). On January 29, 2021, I obtained a federal arrest warrant for Kamar THOMPSON charging him with one count of Title 18 U.S.C. 922 (g) (1) (possession of a firearm and ammunition by a felon). I, along with an ATF Task Force Officer arrested THOMPSON and transported him to the Lehigh County prison, where he remains today. Included in THOMPSON's property when I transported him was a chrome and silver I-Phone with a green rubber case. I know, based on my training and experience that individuals involved in criminal conspiracies such as the one described in this affidavit use multiple phones to evade law enforcement and layer their involvement in a criminal conspiracy.

KAMAR THOMPSON - VEHICLE SEARCH WARRANT

22. On February 4, 2021, I obtained a search warrant from the Honorable Richard A. Lloret for a 2016 black Chevrolet Impala, VIN# 1G1105SA7GU135379. On February 5, 2021, members of the ATF Philadelphia Arson & Explosives (A&E) Task Force conducted the search of the black Chevrolet Impala with a Pennsylvania license plate of LJT-0914. We found several items of evidence including a set of three silver and black keys marked “Chateau” that were identified as keys used for a lock, typically used at a storage locker facility. We recovered a business card for a Public Storage Facility, located in Bucks County, Pennsylvania. Agents also found a pair of black Adidas sweatpants. (See photograph below).



23. We also found four (4) cellular phones in his car: a grey Verizon E-Talk flip phone, a black UMX Smart Phone, a black “BLU” Smart Phone and a black I-Phone, Model A1660, and a white Samsung handheld video recorder, Model HMX-F90 with micro SD

memory card and an HD-USB Power Charger Wifi Camera and 32 GB SDHC memory card. Lastly, we found two (2) GPS trackers (one in the store purchase box; one out of store purchase box with charger attached), multiple receipts for purchases of luxury designer items from Neiman Marcus and Louis Vuitton. Some of the receipts included THOMPSON's name and dates of purchases that were during this conspiracy.

NFA and FEL QUERIES for EXPLOSIVES; INTERSTATE NEXUS

24. On December 16, 2020, ATF Investigators received results from the ATF National Firearm Registration and Transfer Record (NFRTR) showing that Kamar THOMPSON and Cushmir MCBRIDE do not have any National Firearms Act (NFA) weapons registered in the NFRTR.

25. On December 16, 2020, ATF Investigators received results from ATF Industry Operations, who maintain and ensure compliance with Federal Explosive Licenses (FEL) and/or Permits to legally possess or use explosives. The results of this query show that Kamar THOMPSON and Cushmir MCBRIDE do not have any FELs or Permits registered to any of their residences.

26. On January 28, 2021, I conducted interstate nexus determinations on the .45 caliber ammunition recovered loaded in the Glock magazine recovered inside THOMPSON's satchel bag and the Glock .45 pistol located in THOMPSON's residence because I am a certified interstate nexus expert. I determined that the ammunition recovered in the magazine and the firearm recovered from the residence were not manufactured in the Commonwealth of Pennsylvania, therefore by virtue of their possession in Pennsylvania, they traveled in interstate commerce. As a convicted felon, THOMPSON is legally prohibited from possessing any firearms or ammunition under Title 18 U.S.C § 922 (g) (1).

THE EXPLOSIVES ATM INVESTIGATION

27. Approximately 25 explosives incidents occurred between October 2020 and December 2020, in and around Philadelphia during a period of civil unrest. I have been working with ATF investigators to identify those responsible for approximately seven (7) of these crimes that we believe are related because similar methods were used by individuals who we believe were working together, based on the evidence we marshalled so far¹. In the summaries included here, have not included every fact about these violations of Title 18 U.S.C. §§ 844 (i) and (n). In each of the explosives' scenes listed below, agents collected evidence at the scene and submitted it for forensic testing. All the lab reports that we have received to date have given a positive indication for the presence of a perchlorate/chlorate explosive mixture. In addition, investigators recovered a green bag from THOMPSON's vehicle that the ATF Forensic laboratory determined contained explosive residue. This bag resembles a green bag observed on the surveillance video depicting Scene #4. (See paragraph 39)

Scene #1- 2701 Castor Avenue, Philadelphia, PA (October 28, 2020)

28. On October 28, 2020, PPD officers received reports of multiple individuals looting the Target store at 2701 Castor Avenue and using explosive devices to steal contents from the ATM located inside the store.

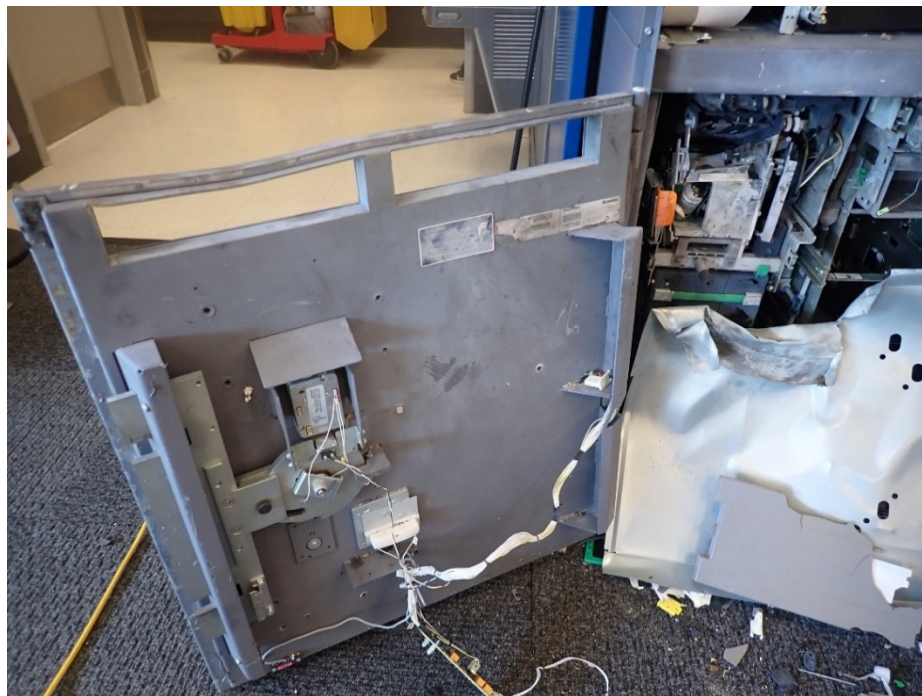
29. On November 2, 2020, ATF's Arson & Explosive Task Force members responded to 2701 Castor Avenue, Philadelphia, Pennsylvania to conduct a limited post blast examination of a damaged ATM. Several pieces of cardboard debris were observed and

¹ Recently, on March 2, 2021, an ATM explosion occurred in Chestnut Hill section of Philadelphia, Pennsylvania that we believe might have been committed by McBRIDE, Person #1, and unknown persons.

recovered in and around the front of the ATM's location. Thermal damage was also observed on the ATM housing as well as the exterior metal ATM door located at the front of the machine.



2701 Castor Avenue, Philadelphia- Target Damaged ATM



Thermal and Blast damage to Capitol One ATM

30. Investigators obtained surveillance video from the Target which showed that on the morning of the ATM explosion, two suspects enter the store, obtain a shopping cart, and steal various items, to include what appears to be cases of diapers and a baby car seat. They approach the ATM and try to break into it before leaving the store pushing a shopping cart with their stolen goods out of exterior camera view. A short time later, one of the men and another person wearing sneakers similar to those observed in Kamar THOMPSON's house (See paragraph 20) get out of a dark or grey colored Nissan Altima that pulls up to an unlocked non-public entrance. The two suspects get out of what appears to be the passenger side of the Nissan and enter the store. One of the suspects finds a store issued yellow safety coat on the floor near the Target service desk and puts it on. These suspects go to the ATM, where one of them places an explosive device into the machine and attempts to light it. After a failed attempt, the same suspect, who is wearing the sneakers like those observed at THOMPSON's residence, lights the device again. Both suspects run and an explosion occurs. The suspects run back to the machine, appear to pick up money and put it into a box. They quickly leave the store with the box, run out the same door they entered the building, and get into the Nissan Altima, fleeing the store. The photos of this incident and evidence related to this incident appear below.





Sweatpants Recovered during Search of black Impala



Shoes Documented during Search at THOMPSON Residence

31. Investigators contacted Capitol One Bank, who stated the total cash stolen from the machine was approximately \$39,628. The cost of the replacement of the ATM is approximately \$50,000.

Scene #2- 3230 Richmond Street, Philadelphia, PA (October 29, 2020)

32. On October 29, 2020, members of the PPD Bomb Disposal Unit and ATF Arson & Explosive Task Force members responded to a Wawa convenience store located at 3230 Richmond Street, Philadelphia, Pennsylvania for a report of an explosion. Upon arrival, investigators observed two (2) PNC Bank ATMs had sustained significant explosive damage. One of the ATM's exhibited heavier explosive damage and appeared to have money stolen from the safe inside the machine.



Two PNC ATMs with blast damage-3230 Richmond Street, Philadelphia



Photo taken by PPD BDU prior to scene processing-3230 Richmond St.

33. Investigators spoke with a Wawa area manager who advised that he received an alarm alert around 2:00 a.m. for glass breaking at the store. The manager then indicated that within a minute or two of the first alarm, he received a secondary fire alarm alert. The manager stated that he arrived at the store at approximately 7:30 a.m. and observed money on the floor in the vestibule as well as on the floor in front of the ATM. The manager stated that money had been blown everywhere in the store to include the Express Food Case near the machines. The manager also indicated that he observed items that the suspects left behind. The manager stated he collected the items (using latex Wawa deli-gloves), to include a white hard hat marked "Milwaukee" described below, and placed them into a cardboard box, which he provided to investigators. Investigators observed a yellow DeWalt Pry Bar, a black or dark facemask of some sort and a white hard hat marked "Milwaukee." The manager also pointed out a long black, steel pole that the suspects left behind as well. The suspects were able to totally breach the safe to one ATM and steal a large amount of money.

34. Investigators reviewed Wawa surveillance video, which captured the explosion. The video shows, at approximately 1:43 a.m., three males broke the front glass door and entered the store. Two of the males, who were both dressed in construction vests went directly to the ATM. The third male went toward the center of the store where the cash register was located. The males wearing the construction vests are seen placing what appears to be an illegal explosive device into the ATM closer to the PA lottery machine and the ATM explodes. One of the males wearing a construction vest is also wearing a white hard hat with markings on the side of the helmet. As this male was attempting to breach the ATM, the hard hat fell off his head and into an adjacent trash-can and was left behind. The males are observed putting large amounts of money into a Wawa trashcan. The males then place another device into the second ATM, which

is followed by a second explosion. The males then leave the store toward some vehicles parked on the north end of the Wawa parking lot. A dark colored or grey Nissan Altima is seen on video fleeing the scene. The video also shows that later another individual, a white male, entered the store later and stole some of the cash left behind by the individuals who destroyed the ATMs.



35. A bank loss statement was obtained from PNC bank showing that \$150,610 was stolen from one of the machines. The second ATM was not breached entirely. The explosive blasts caused \$10,000 in damage to the machines.

36. PPD Crime Scene Unit (CSU) processed the recovered "Milwaukee" hard hat for latent prints. PPD CSU recovered four (4) latent prints from the hard hat left behind by the

suspects. The recovered latent prints were processed through the Automated Fingerprint Investigative System, (AFIS), which resulted in a positive result, indicating that all the fingerprints belonged to Cushmir MCBRIDE².

Scene #3- 3230 Richmond Street Philadelphia, PA (October 31, 2020)

37. On October 31, 2020, at approximately 3:05 a.m., two males entered the Wawa convenience store located at 3230 Richmond Street, Philadelphia, Pennsylvania (the same store as described in Scene #2 above). Video shows the two males³ approached from the rear of the store. One male, a thin individual, who was dressed in a dark hooded sweatshirt, a dark mask, light-colored gloves, and dark pants, carried a dark crowbar. The other male wore light-colored pants, a light-colored mask, gloves, a yellow and orange construction vest overlaying a dark hooded sweatshirt, and a fedora-type hat. The two males forced their way through an outer door and entered the store vestibule. After peering inside the store in the direction of store ATMs, the males left the vestibule and returned to the parking lot. The males walked to the rear of the Wawa, out of view. A short time later, a gold Chevrolet Malibu with an illegible Pennsylvania license plate is seen on the surveillance video headed south on Emery Street. Nothing was taken in this incident.

² MCBRIDE owns a dark grey Nissan Altima.

³ Person #1 was in Florida between October 30 and November 2, 2021, so he could not have participated in the burglary of the Wawa on Richmond Street described as Scene #3 and the arson of the ATM at the Wawa on Roosevelt Boulevard described as Scene #4.



Two Males at Wawa - 3230 Richmond Street, Philadelphia, PA

Scene #4- 7001 Roosevelt Blvd. Philadelphia, PA (October 31, 2020)

38. On October 31, 2020, at approximately 4:20 a.m., shortly after the burglary at the Wawa at 3230 Richmond Street, PPD officers responded to a report of a burglary at the Wawa store located at 7001 Roosevelt Boulevard, in Philadelphia. Upon arrival, officers observed significant structural and thermal damage to one of the two PNC Bank ATM's inside the store. PPD BDU personnel responded and conducted a post-blast investigation (See below photos). According to Wawa, the money inside the ATM had been removed by store employees when the store closed, prior to the explosion on October 31, 2020.



Two PNC Bank ATMs- 7001 Roosevelt Blvd. Philadelphia, PA



ATM located at 7001 Roosevelt Blvd.

39. Investigators obtained surveillance video from the Wawa, which captured two males get out of a gold Chevrolet Malibu, walk to the rear entry door of the Wawa and force entry into the convenience store. One of the males is wearing a construction vest and a fedora type hat and a carrying green bag. The two males approach the area of the ATM's then move away. Several moments later, the cameras are seen shaking and a cloud of white smoke appears, indicating an explosive event occurred. The two males returned, inspected the ATM, and fled from the Wawa. The two males entered the gold Chevrolet Malibu that was waiting for them and the gold Chevrolet Malibu fled parking lot. Based on the investigation, I believe at least one other person was left in the vehicle to be the getaway driver. The clothing worn by both men appears identical to the clothing worn by the suspects observed at the Richmond Street Wawa less than two hours earlier.



Scene #5- 301 Ridge Road, Claymont, Delaware (November 5, 2020)

40. Surveillance video shows that on November 5, 2020, at approximately 4:21 a.m., a gold Chevrolet Malibu pulled into the parking lot of the Wawa located at 301 Ridge Road, in Claymont, Delaware, which, unlike the other businesses mentioned above, was open for business.⁴ Two males wearing dark pants, dark masks, dark hooded sweatshirts, and construction yellow/orange reflective vests, exit the passenger side of the Malibu, which remained in the parking lot. Based on the investigation, I believe at least one other person was left in the vehicle to be the getaway driver. The men resemble those in the other incidents with similar body types and clothing. Video shows one of the males wearing a fedora-style hat and gloves that are like those worn at the 7001 Roosevelt Boulevard Wawa. This male is also carrying an orange or red, duck-billed crowbar, which he takes into the open business. The Wawa was staffed by at least two (2) employees at the time of the incident. At least one of these employees was serving customers just prior to the two males entering the store.

41. The victim employees stated two unknown suspects entered the business wearing black clothing with reflective construction vests and armed with pry bars. One of the suspects went directly to an ATM, while the other suspect approached the employees brandishing a pry bar ordering them to comply with his demands. This male left a plastic trash bag on or near the center counter area of the Wawa where he had corralled the employees. He demanded the victim's cellular phones and stated, "we're not going to hurt you, we're only here for the ATM."

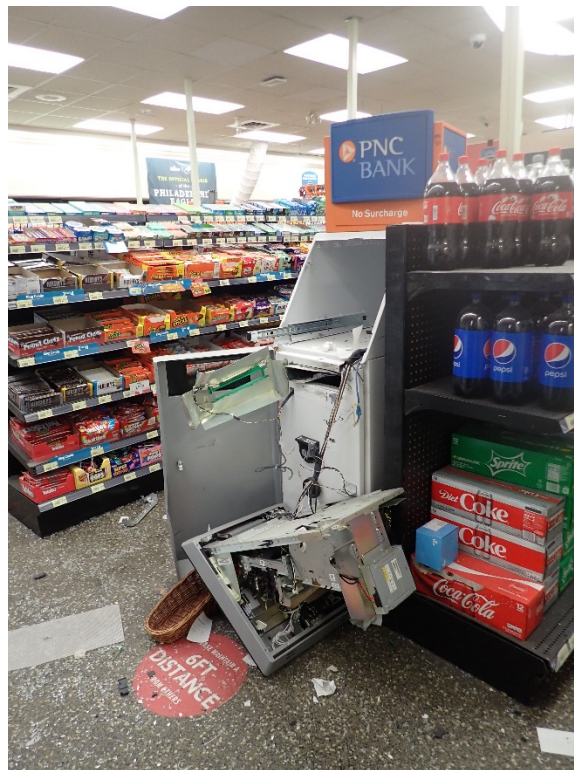
⁴ Investigators also recovered additional surveillance video from another Wawa located at 601 Naamans Road, Claymont, Delaware, minutes from the Wawa at 301 Ridge Road. The video depicts a gold Chevrolet Malibu drive through the parking lot of the Wawa approximately one hour before it is observed in surveillance video driving into the Wawa parking lot at 301 Ridge Road. The vehicle pulls up to a gas pump at the Naamans Road Wawa and sits idle for a few minutes but no gets out of the car while they are at the gas pump.

An explosion occurred. The employees reported that the males checked the ATM and ran out the front doors. Surveillance video shows that the males approached the ATM and ran away from it, with one holding his ears. A short time later, an explosion occurs. The males return to the ATM and then fled the store with the orange/red crowbar. The safe in the machine was not breached so they were unsuccessful in stealing the money. The males returned to the gold Chevrolet Malibu and the brake lights of the Malibu activated as the males approached it. The Malibu, which appears to have a Pennsylvania license plate, pulled out of the parking lot with its headlights off at approximately 4:38 a.m. and traveled in the direction of Interstate 95 North, a highway that leads to Pennsylvania.



The two males at 301 Ridge Rd, Claymont, DE.

42. On November 5, 2020, an ATF Bomb Technician and bomb technicians from the Delaware State Police, conducted a post-blast investigation of the ATM at the Claymont Wawa. The machine was heavily damaged and parts of it exhibited thermal and soot damage. Investigators recovered red cardboard debris and red plastic that appeared like the materials recovered from the Wawa on Roosevelt Boulevard. Delaware State Police crime scene units also recovered a dark colored plastic trash bag left at the store by one of men who committed these crimes.



PNC Bank ATM-301 Ridge Rd. Claymont, DE



PNC Bank ATM-301 Ridge Rd. Claymont, DE

43. On November 5, 2020, the Upper Chichester Police Department (UCPD) conducted a check of traffic cameras and Automatic License Plate Readers (ALPRs) in Upper Chichester, Pennsylvania, which is very close to the Pennsylvania/Delaware state border. Detectives identified a gold Chevrolet Malibu bearing Pennsylvania license plate LMN-9806. The UCPD located the vehicle backed into a parking space at the Boothwyn Court Apartments, located at 2820 Chichester Avenue, in Boothwyn, Pennsylvania, less than three miles from the Wawa at 301 Ridge Road in Claymont, Delaware. A PPD report revealed the Pennsylvania license plate bearing LMN-9806 was reported stolen from a different vehicle on October 27, 2020.

44. Law enforcement established surveillance on the gold Chevrolet Malibu at the apartment complex that was parked near the “D” building of the apartment complex. During this surveillance, investigators went to the vehicle and observed that a folded-up piece of paper was placed over the VIN# on the dashboard. A large orange/red crowbar could be seen through the front windshield in the front passenger seat. The vehicle was seized by UCPD for having a stolen license plate.

45. On November 12, 2020, an ATF Task Force Officer obtained a federal search warrant approved by the Honorable Lynne A. Sitarski for the gold Chevrolet Malibu bearing Pennsylvania license plate LMN-9806, VIN# 1G1ZB5E14BF120411. Investigators searched the vehicle and found Pennsylvania license plate KXL-4951 on the rear floorboard. A Pennsylvania Department of Transportation vehicle record check of PA license plate KXL-4951 indicated that the plate belonged on the vehicle being searched, a Chevrolet with VIN# 1G1ZB5E14BF120411, registered to Kamar THOMPSON, 601 Magee Ave. Fl. 1, Philadelphia, Pennsylvania. I believe this license plate was removed and replaced by the stolen one located on the car to conceal THOMPSON’s connection to the car used in these crimes. A second Pennsylvania license plate ZLY-4698 was also recovered from the rear driver’s side floorboard. A Pennsylvania Department of Transportation vehicle record check revealed that PA Plate ZLY-4698 was reported stolen on November 4, 2020 in Philadelphia, PA. To date, THOMPSON has never reported his gold Chevrolet Malibu stolen.

46. The folded paper concealing the VIN# located on the dashboard of the vehicle, along with a white, “Jason” Halloween mask recovered from the vehicle were processed by the PPD Crime Scene Unit. PPD CSU recovered four latent prints from the folded piece of paper and two latent prints from the white facemask. The recovered latent prints were processed

through AFIS. A positive result through AFIS indicated that the fingerprints belonged to Kamar THOMPSON. Additionally, PPD CSU recovered a separate latent print from the Chevrolet Malibu, which was processed through AFIS. This fingerprint belonged to Person #1. In addition, investigators recovered a green bag (see paragraph 39 above), that resembled the green bag that is observed in surveillance video depicting Scene #4 described above. A later laboratory analysis by the ATF Forensic Laboratory determined that the green bag contained explosive residue.

47. In THOMPSON's vehicle, officers found a white hard hat, later tied to Kamar THOMPSON and several documents including the following: the vehicle title, pink-slip for the vehicle, insurance card and traffic court receipts for the Chevrolet Malibu in the name of Kamar THOMPSON. PPD CSU recovered one AT&T RTR receipt from the front driver's seat of the Chevrolet Malibu, dated October 31, 2020, at 1:22:48 a.m. for \$68 for phone number 267-693-6720 (See below image).



48. The Delaware State Police fingerprint lab identified the fingerprints recovered from the plastic trash bag recovered from inside the Wawa on Ridge Road, in Claymont, Delaware as belonging to Kamar THOMPSON.

Scene #6 - 4600 Roosevelt Blvd. Philadelphia, PA (December 2, 2020)

49. On December 2, 2020, at approximately 4:59 a.m., members of the ATF Arson & Explosives Task Force responded to 4600 Roosevelt Boulevard, in Philadelphia, Pennsylvania for a report of an ATM explosion. Upon arrival, investigators observed a heavily damaged free-standing Wells Fargo Bank ATM located in the parking lot of the Chick-Fil-A. A post blast examination was conducted of the scene and investigators recovered evidence indicative of a minimum of two illegal explosive devices placed on the front of the ATM. United States Currency was on the ground in front of the ATM. Additionally, investigators recovered

cardboard debris, red plastic debris, pieces of the ATM housing with visible residue, two blue latex gloves, several traffic cones, and a large orange/red crowbar like the one recovered in THOMPSON's Chevrolet Malibu.



Wells Fargo ATM-4600 Roosevelt Blvd. Philadelphia



Wells Fargo ATM- 4600 Roosevelt Blvd. Philadelphia

50. A review of surveillance video obtained from Wells Fargo and other commercial businesses in the complex captured two males wearing construction reflective vests and masks exit a small silver SUV, place several traffic cones around the ATM location and approach the ATM with two crowbars. The two males use the crowbars to attempt to break into the ATM. One male is observed placing an item in the ATM and both males run away from the ATM just before an explosion. The two males return to the ATM and place another item into the machine. Both males run away from the ATM just before the explosion. The second explosion breached the ATM's safe. The two males rummaged through the exposed interior of the ATM stealing money. Wells Fargo reported to investigators that approximately \$65,845 was stolen from the machine.

Scene #7 – 7782 Crittenden Street, Philadelphia, PA (March 2, 2021)

51. On March 2, 2021, at approximately 5:42 am, PPD officers responded to a report of a burglar alarm at the ATM located at the Wells Fargo Bank, 7782 Crittenden Street in Philadelphia, Pennsylvania. Upon arrival, officers observed significant damage to a Wells Fargo ATM directly adjacent to the Wells Fargo Bank building. Members of the ATF Arson & Explosives Task Force responded to 7782 Crittenden Street, in Philadelphia, Pennsylvania to investigate the explosion. A post blast examination was conducted of the scene and investigators recovered evidence indicative of a minimum of two illegal explosive devices placed on the front of the ATM. United States Currency was on the ground in front of the ATM. Additionally, investigators recovered cardboard debris and pieces of the ATM housing with visible residue.



Damage as found upon arrival at Wells Fargo ATM – 7782 Crittenden St., Philadelphia

52. A review of surveillance video obtained from Wells Fargo shows two unknown persons exit a white/black GMC Isuzu dump truck with “Grassworks Landscaping” on the door. The unknown persons are wearing construction type reflective vests, helmets, gloves, and masks. The individuals approach the ATM and use a crowbar to force open the exterior metal door of the ATM. The individuals use the crowbar on the interior safe door. One of the individuals, wearing a reflective vest produces a red cylindrical object. The individual bends over, places the object into the interior safe door near the money slots, then both individuals run towards the dump truck. A bright flash of light from an explosion occurs followed by debris and light-colored smoke emitting from the front of the ATM. The ATM camera is observed shifting higher causing the bottom portion of the ATM to be out of view. I believe that the ATM camera is moved due to the blast pressure from the initial explosion. Both individuals are seen returning to the ATM, which is still smoking. A second bright flash of light is observed followed by

debris and light-colored smoke from the front of the ATM (a second explosion). Both individuals return and are seen bending over in front of the ATM, picking up money from the ground and placing it in a plastic bag. The individuals return to the dump truck and leave the parking lot. Wells Fargo reported to investigators that approximately \$161,380 was stolen from the machine.



Wells Fargo video still of individual with hand sledge and pry bar

PUBLIC STORAGE and ARRIVE (University City) APARTMENTS SEARCHES

53. During the search of Kamar THOMPSON's black Chevrolet Impala, investigators recovered a set of black and silver keys marked "Chateau" and a business card for a Public Storage facility, later identified as the "Public Storage", located at 950 Jaymor Road, Southampton, PA 18966, Unit L-393. Investigators were able to identify that the keys recovered in the vehicle belonged to this unit. On February 5, 2021, I obtained a Federal Search Warrant for this storage unit from the Honorable Richard A. Lloret. On the same date, agents searched the storage unit and found it was empty.

54. On January 28, 2021, PPD Officers arrested Kamar THOMPSON. During the incident (previously described in Paragraph 19), officers recovered a large key ring containing numerous keys and what appear to be vehicle keys. Included on this key ring was a set of two keys with a blue key chain marked "Welcome Home." Investigators have observed and obtained information that both Kamar THOMPSON's black Chevrolet Impala, and Cushmir McBRIDE's 2013 Nissan Altima were parked outside 3601 Market Street, in Philadelphia, Pennsylvania. The Arrive University City Luxury Apartments is located at that address. Investigators were able to recover surveillance video from the building which showed McBRIDE arriving and leaving this apartment complex.

55. Agents determined that THOMPSON's keys and his key chain marked "Welcome Home" were for a mailbox and the front door of Apartment #1712 in the University City Luxury Apartments. The property manager stated that the apartment was vacant and the eviction notices were piling up at the apartment door. On February 26, 2021, ATF investigators obtained a Federal Search Warrant for 3601 Market Street, Philadelphia, Apartment # 1712. The warrant was approved by the Honorable David S. Strawbridge on February 26, 2021. On the same date, agents went to this apartment and used the keys recovered from THOMPSON to access the apartment door. During the search of the apartment, Agents collected bills in the name of Kamar THOMPSON for 601 Magee Avenue, along with numerous receipts for luxury retail purchase from stores such as Louis Vuitton.

56. The same large key ring referenced above also included a black car key, which appeared to belong to a Chevrolet vehicle. On March 3, 2021, an ATF Task Force Officer and ATF Special Agent went to Luongo's Towing located at 338 Parkmount Road, Glen Riddle, Pennsylvania, to find Kamar THOMPSON's Chevrolet Gold Malibu in storage there.

Investigators tried the black car key located on the key ring THOMPON had on him when he was arrested. This key unlocked the vehicle door of the gold Chevrolet Malibu found in Boothwyn Pennsylvania after the explosive incident at the Wawa, in Claymont, Delaware. Kenniyah Hilliard, McBRIDE's family member lives in that apartment complex where the gold Chevrolet Malibu was located.

RECOVERY OF CUSHMIR McBRIDE'S CELL PHONE

57. On February 9, 2021, members of the Pennsylvania Attorney General's Office Gun Violence Task Force (GVTF) and the United States Marshal's Violent Crimes Fugitive Task Force (VCFTF) arrested a fugitive in an unrelated investigation at 404 W. Thompson Street, Philadelphia Pennsylvania. During the arrest, agents from those task forces observed multiple firearms and cell phones throughout the house. Agents then obtained a Pennsylvania state search and seizure warrant for observed items, including the cellular telephones. During that search, among other items, the agents seized a white iPhone with a Pennsylvania Identification Card that was stored in the clear cell phone case. The Identification Card could be seen through the clear case. The Identification Card was issued to Cushmir McBRIDE. See photos below.



MCBRIDE's cell phone recovered from 404 W. Thompson Street, Philadelphia

601 MAGEE AVENUE – SEARCH WARRANT

58. On March 11, 2021, I applied for a Federal Search Warrant for 601 Magee Avenue, 1st Floor, in Philadelphia, Pennsylvania, that was approved by the Honorable Lynne A. Sitarski. On March 11, 2021, I, along with members of the ATF Philadelphia A&E Task Force, searched 601 Magee Avenue, 1st Floor, Philadelphia, Pennsylvania. We recovered a Fiskars axe that we saw previously during the January 28, 2021 search of same address⁵. This was similar to the axe that the person used to destroy the ATM in Target (Scene #1).

59. During the search, I interviewed the landlord (owner) of 601 Magee Avenue, Philadelphia, Pennsylvania. He told me that shortly before February 22, 2021, he and his workers moved the majority of THOMPSON's belongings to the unoccupied commercial space below the 1st Floor. On February 22, 2021, THOMPSON's girlfriend and others removed some of THOMPSON's belongings. They left a significant number of trash bags of items that had been removed from THOMPSON's apartment. The landlord asked THOMPSON's girlfriend what she was going to do about the remaining items. She told him that they were trash and she was not taking them. The landlord told me that he was going to be throwing the items away. The landlord gave consent to members of the ATF Philadelphia A&E Task Force to search the trash bags and other items that once belonged to THOMPSON. Investigators then found and recovered orange and black Nike sneakers. These were the sneakers observed during the January 28, 2021 search of the address mentioned above. They are like the sneakers that a suspect was wearing in the Target ATM explosion (Scene #1).

⁵ On the date of the original search, we could not seize the axe or the sneakers described in paragraph 58 and shown in photographs in paragraph 20, because the seizure of those items was not authorized by that warrant.

LABORATORY TESTING SUMMARY

60. As part of this investigation, various items of evidence have been sent to forensic laboratories including the PPD Forensics Lab, the Delaware State Police Lab, and the ATF Forensic Lab. In summary, the analysis of some of this evidence have yielded the following results:

- **Scene #2 - 3230 Richmond Street, Philadelphia, PA:** Cushmir McBRIDE's fingerprints located on a "Milwaukee" hard-hat (Philadelphia Police Department Laboratory).
- **Scene #2 – 3230 Richmond Street, Philadelphia, PA:** Red Plastic fragments; Residue and combustion products of a perchlorate/chlorate explosive mixture (ATF Laboratory)
- **Scene #4 – 7001 Roosevelt Boulevard, Philadelphia, PA:** Red Fragments; Red and brown cardboard pieces; Damaged red plastic fragments; and, Plastic ATM parts – residue/combustion products of a perchlorate/chlorate explosive mixture (ATF Laboratory)
- **Scene #5 – 301 Ridge Road, Claymont, Delaware:** Piece of ATM housing with circuit board and visible residue; Residue, and Combustion product of a potassium perchlorate mixture identified (ATF Laboratory)
- **Scene #5 – 301 Ridge Road, Claymont, Delaware:** Kamar THOMPSON's Fingerprints on a trash bag (Delaware State Police Laboratory).
- **Gold Chevrolet Malibu Search Warrant:** Kamar THOMPSON's Fingerprints recovered from documents and a mask (PPD Laboratory).

- **Gold Chevrolet Malibu Search Warrant:** Person #1's Fingerprints (PPD Laboratory)
- **Gold Chevrolet Malibu Search Warrant:** Green reusable shopping bag with white lettering; Areas of the bag were damaged (charred/melted); Small fragments of damaged brown cardboard, some with a red paper surface; grey residue present; and, Residue contained products of a perchlorate/chlorate explosive mixture (ATF Laboratory) (bag believed to be carried in Scene #4)
- **Scene #6 – 4600 Roosevelt Boulevard, Philadelphia, PA:** Red cardboard pieces; Red plastic pieces; ATM debris or fragments; and, Residue/combustion products of a perchlorate/chlorate explosive mixture (ATF Laboratory)

CELL PHONE IDENTIFICATION AND LOCATION DATA ANALYSIS

61. ATF Investigators have collected data to conduct cell phone and location analysis, including subscriber information, account information, historical Call Detail Records (CDRs/Toll Records) and historical cell tower location data believed to be evidence of Kamar THOMPSON's, Cushmir McBRIDE's and Person #1's participation in this conspiracy to commit arson. These records have been obtained through grand jury subpoenas and search warrants. I believe that at least three phone numbers were used by THOMPSON, McBRIDE and Person #1 during the conspiracy.

62. On November 12, 2020, an ATF Task Force Officer obtained a federal search warrant approved by the Honorable Lynne A. Sitarski for a gold Chevrolet Malibu, VIN# 1G1ZB5E14BF120411 registered to Kamar THOMPSON (See paragraph 45). Investigators searched the vehicle and recovered one "AT&T RTR" receipt from the front driver's seat of the

Chevrolet Malibu, dated October 31, 2020, at 1:22:48 a.m. for \$68 for phone number 267-693-6720 (see below image). I learned that these types of receipts are for AT&T “go-phones” or prepaid phones. I learned that “RTR” refers to “Real Time Refill,” meaning adding money for prepaid phone service. This phone number was used by THOMPSON (THOMPSON PHONE).



63. On October 1, 2019, Person #1 was stopped in a black 2014 Chevrolet Impala, PA License Plate KZL-2422 owned by Tracy Tidwell, of 5830 Race Street and issued a traffic summons. During this police encounter, Person #1 provided his cellular phone number as 267-624-8580. On November 14, 2019, Person #1 was investigated driving a red 1996 Honda Accord, DE License Plate XP709426. According to the report, Person #1 provided cellular number 267-624-8580 to police (Person #1 PHONE).

64. Investigators reviewed call detail records for THOMPSON PHONE and PERSON #1 PHONE and identified another relevant number 302-585-6126, that we

believe was used by McBRIDE (McBRIDE PHONE), which has common, frequent contacts with the others. The call detail records show that between October 27, 2020 and November 5, 2020, THOMPSON PHONE and Person #1 PHONE were both in contact with McBRIDE PHONE. They were in contact on the day prior to an explosive incident and/or the day of the crimes.

65. As a result of the above listed information, Agents obtained historical call detail records with location data.

66. All three of these phone numbers were maintained by AT&T from October 28, 2020 through November 6, 2020. Person #1 PHONE is still maintained by AT&T.

67. AT&T records show that THOMPSON PHONE is a pre-paid phone and subscribed to "Josh Smith" at 2236 N. Broad Street. I reviewed open source records to conclude that "Josh Smith" does not reside at that address. Through surveillance ATF learned that 2236 N. Broad Street is a vacant lot. The account number for THOMPSON PHONE, listed as 464128832717, was activated on October 17, 2019 and listed as active when the records were furnished. It appears the phone drastically reduced its regular calling and texting activity on or about December 3, 2020, with some exceptions. There were incoming call attempts made to that phone until on or about January 11, 2021.

68. On or about December 13, 2020 and on or about January 11, 2021, ATF received phone records from AT&T for 267-624-8580 (Person #1's PHONE) showing that the phone is a pre-paid phone subscribed to "Tyree Johnson" at 4060 Lancaster Avenue, in Philadelphia, Pennsylvania. The account number, listed as 464128965415, was activated as of October 23, 2019 and was listed as active, or current as of the date these records were furnished. The email address listed on the subscriber sheet for the record lists an email address that contains Person

#1's first and last name. Based on open source searches, there were no residents named "Tyree Johnson" living at that address. Based on visual surveillance, it appears that 4060 Lancaster Avenue is a phone store. After reviewing records obtained for this phone, the phone is still actively using data, making and receiving calls and text messages as of March 1, 2021.

69. On or about December 13, 2020, ATF received phone records from AT&T showing that McBRIDE PHONE is a post-paid phone listed as a "TRACFONE" with no corresponding subscriber or billing information. The account number, listed as 464134340293, was activated as of September 19, 2020 and was listed as active, or current as of the date these records were furnished. After a review of records obtained for this phone, it appears the phone significantly reduced regular calling and texting activity on or about November 19, 2020, with some exceptions. There were additional incoming call attempts made to that phone until on or about December 9, 2020.

70. McBRIDE PHONE has multiple contacts to phone number 484-479-4916. As mentioned above in paragraph 13, Kenniyah Hilliard provided her contact number to police as 484-479-4916. A review of phone contacts between McBRIDE PHONE and Hilliard show multiple contacts before and after the ATM explosion at the Wawa at 301 Ridge Road, in Claymont, Delaware. Specifically, on November 5, 2020 a contact from McBRIDE PHONE to Hilliard at approximately 4:18 a.m. (just prior to the Wawa incident) and then again from McBRIDE PHONE to Hilliard at approximately 4:49 a.m., after the explosive incident at the Wawa. There are also multiple attempted phone contacts made between the two numbers later in the day on November 5, 2020. On November 6, 2020, the day police towed THOMPSON's Gold Malibu from Kenniyah Hilliard's apartment complex there are additional attempted contacts and a call between the numbers. On March 12, 2021, I also received documents

obtained from American Airlines that show that McBRIDE and Kenniyah Hilliard traveled together during August 2020, further demonstrating their close relationship.

71. The distance between the Wawa at 301 Ridge Road to Hilliard's apartment complex at 2820 Chichester Avenue is approximately 2 to 2 ½ miles depending on direction of travel. This Wawa is approximately 1.6 miles to Person #1's residence.

72. ATF analyzed the AT&T historical Cell Tower Data for these three phone numbers for each of the crimes described below:

**Scene #1 - Target ATM - 2701 Castor Avenue, Philadelphia, PA – October 28, 2020
between 6:00 – 8:00 A.M.**

73. On October 28, 2020, throughout the early morning hours, THOMPSON PHONE, Person #1, and McBRIDE PHONE were active and connecting to cellular telephone towers (cell towers). At approximately 3:22 a.m., Person #1 Phone and McBRIDE PHONE are in the same area, connecting to the same cell tower. From approximately 3:30 a.m. to 4:15 a.m., Person #1 Phone and McBRIDE PHONE travel northeast into Philadelphia. At approximately 4:18 a.m., THOMPSON PHONE, Person #1 Phone, and McBRIDE PHONE are all connecting to cell towers in an area near the Lawncrest section of Philadelphia. Person #1 PHONE and McBRIDE PHONE travel away from the area and appear to be traveling together, connecting to the same or nearby cell towers at similar times. At approximately 5:00 a.m., Person #1 PHONE and McBRIDE PHONE travel from west to east, connecting to cell towers that cover the area near 2701 Castor Avenue (Scene 1 location) at approximately 5:25 a.m. Between approximately 6:14 a.m. and 6:46 a.m., there are multiple phone calls between THOMPSON PHONE and McBRIDE PHONE as THOMPSON PHONE travels south. At approximately 6:46 a.m., THOMPSON PHONE, Person #1 PHONE, and McBRIDE PHONE are all connecting to cell towers that cover

the area near 2701 Castor Avenue. The first indication of any the three phones leaving the Scene 1 area occurs at approximately 7:57 a.m., when McBRIDE PHONE begins traveling north. At approximately 8:03 a.m., Person #1 PHONE also appeared traveling north with McBRIDE PHONE. At approximately 8:56 a.m. and 9:28 a.m., THOMPSON PHONE connected to the tower covering the Scene 1 area again. Person #1 PHONE and McBRIDE PHONE travel past the Scene 1 area, but continue traveling south. At approximately 9:35 a.m., THOMPSON PHONE is seen leaving the Scene 1 area and traveling north. By approximately 9:50 a.m., THOMPSON PHONE is back in the Lawncrest area and Person #1 PHONE and McBRIDE PHONE are near the Pennsylvania/Delaware border near Claymont, Delaware.

**Scene #2 - Wawa ATM - 3230 Richmond St, Philadelphia, PA – October 29, 2020
between 1:24 – 1:50 A.M.**

74. On October 29, 2020, cellular telephones used by THOMPSON, Person #1, and McBRIDE were active and connecting to cell towers. From 12:00 a.m. to approximately 12:55 a.m., THOMPSON PHONE, Person #1 PHONE, and McBRIDE PHONE were all active and all connecting to cell towers within close proximity to each other as they traveled throughout the area near North and Northwest Philadelphia. At approximately 12:55 a.m., all three phones travel east/northeast, in the direction of 3230 Richmond Street (Scene 2). At approximately 1:03 a.m., McBRIDE PHONE connects to a cell tower the covers the area of Scene 2. At approximately 1:07 a.m., Person #1 PHONE also connects to a cell tower that covers the area of scene 2. At approximately 1:24 a.m., THOMPSON PHONE connects to a cell tower that covers the area of Scene 2. THOMPSON PHONE, Person #1 PHONE, and McBRIDE PHONE have multiple connections to cell towers covering the area of Scene 2 within the same period. At approximately 1:51 a.m., McBRIDE PHONE begins to travel south away from Scene 2. By

approximately 1:53 a.m., all three cell phones are traveling south, connecting to the same or nearby towers within the same time. Between approximately 2:14 and 2:18 a.m., all three phones connect to the same tower near Pennsylvania/Delaware border that covers the area near Claymont, Delaware.

**Scene #3 – Wawa Burglary - 3230 Richmond St, Philadelphia, PA – October 31, 2020
between 3:00 – 3:06 A.M.**

75. On October 31, 2020, cellular telephones used by THOMPSON, Person #1 , and MCBRIDE were active and connecting to cell towers. Person #1 PHONE was connecting to cell towers near Kissimmee, Florida during the duration of this event. From approximately 1:00 a.m. through 2:00 a.m., THOMPSON PHONE and McBRIDE PHONE were active in the north/northwest area of Philadelphia. THOMPSON PHONE and McBRIDE PHONE were in close proximity, connecting to the same or nearby towers within the same time period. Between 2:24 a.m. and 2:30 a.m., THOMPSON PHONE and McBRIDE PHONE traveled east towards the direction of 3230 Richmond Street (Scene 3). Between 2:29 a.m. and 2:36 a.m., both THOMPSON PHONE and McBRIDE PHONE connect to the same cell tower that covers the area of Scene 3. At approximately 3:30 a.m., both cell phones are in the area near Scene 4 below.

**Scene #4 – Wawa ATM – 7001 Roosevelt Boulevard, Philadelphia, PA – October 31, 2020
between 4:09 – 4:20 A.M.**

76. On October 31, 2020, cellular telephones used by THOMPSON, Person #1 , and MCBRIDE were active and connecting to cell towers. Person #1 PHONE was connecting to cell towers near Kissimmee, Florida, during the duration of this event. At approximately 3:59 a.m., both THOMPSON PHONE and McBRIDE PHONE connect to the same cell tower just south of 7001 Roosevelt Boulevard (Scene 4). THOMPSON PHONE connects to a tower that covers the

area near scene 4 until approximately 4:10 a.m. McBRIDE PHONE does not access another tower again until approximately 5:13 a.m., when it connects with a tower in north Philadelphia. Between 5:20 a.m. and 5:24 a.m., THOMPSON PHONE and McBRIDE PHONE connect to the same tower in north Philadelphia.

77. Regarding Person #1 PHONE and the movement of Person #1 PHONE to Florida - On October 30, 2020, Person #1 PHONE contacts a cell tower near Philadelphia at approximately 1:38 p.m. Person #1 PHONE then goes inactive. Person #1 PHONE next connects to a cell tower near Orlando International Airport at approximately 4:52 p.m. This is consistent with Person #1 PHONE traveling by plane from Philadelphia, Pennsylvania to Orlando, Florida. On November 2, 2020 at approximately 1:12 p.m., Person #1 PHONE connects to a cell tower near Orlando International Airport and then goes inactive. The phone next connects to a cell tower near Philadelphia International Airport at approximately 3:40 p.m. This is consistent with Person #1 PHONE traveling by air from Orlando, Florida to Philadelphia, Pennsylvania.

78. On March 12, 2021, I received records from American Airlines, via a Federal Grand Jury Subpoena showing that on October 30, 2020, Person #1 travelled from Philadelphia to Orlando, Florida, on American Airlines Flight 1848, and returned to Philadelphia via Orlando on American Airlines Flight 688 on November 2, 2020.

**Scene #5 - Wawa ATM - 301 Ridge Rd, Claymont, DE – November 5, 2020,
between 4:20 – 4:38 A.M.**

79. On November 4, 2020, cellular telephones used by THOMPSON, Person #1, and McBRIDE were active and connecting to cell towers. Between approximately 8:41 p.m. and 8:44 p.m., THOMPSON PHONE and McBRIDE PHONE both connected to the same tower near

the Lawncrest area of Philadelphia and Person #1 PHONE is active near the Pennsylvania/Delaware border near Ardentown, Delaware. Between approximately 8:45 p.m. and 9:15 p.m., McBRIDE PHONE connects to dozens of towers as it travels southbound towards Person #1 PHONE. THOMPSON PHONE periodically connected to cell towers that correspond with the locations of McBRIDE PHONE as both phones travel south. At approximately 9:43 p.m., all three phones are connecting to cell towers in the same area. All three phones remain active within ten miles of Claymont, Delaware into November 5, 2020. On November 5, 2020 between approximately 3:00 a.m. and 3:30 a.m., THOMPSON PHONE and Person #1 PHONE are both connecting to cell towers that cover the area near Claymont, Delaware. At approximately 3:34 a.m., McBRIDE PHONE connects to a cell tower that covers Scene 5. The three phones continue to connect to cell towers in the area, which also covers 301 Ridge Road in Claymont Delaware (Scene 5). Between approximately 3:48 a.m. and 3:59 a.m., THOMPSON PHONE, Person #1 PHONE, and McBRIDE PHONE all connect to the same cell tower, which covers the area near Scene 5. From approximately 4:15 a.m. through 4:40 a.m., THOMPSON PHONE, Person #1 PHONE, and McBRIDE PHONE all connect to cell towers in the area covering Scene 5. All three phones remain active in that area until approximately 7:17 a.m., when THOMPSON PHONE and McBRIDE PHONE begin traveling north towards Philadelphia. At approximately 7:50 a.m., THOMPSON PHONE and McBRIDE PHONE arrive back in the Lawncrest section of Philadelphia. TT#2 remained in the Claymont, Delaware area.

**Scene #6 - Wells Fargo ATM - 4600 Roosevelt Blvd., Philadelphia, PA – December 2, 2020
between 4:50 – 5:02 A.M.**

80. On December 2, 2020, the cellular telephone used by Person #1 was active and connecting to cell towers. Investigators do not have location information for THOMPSON or

MCBRIDE during this time. Between 12:00 a.m. and 1:00 a.m., Person #1 PHONE connects to cell towers near Darby, Pennsylvania. At approximately 1:10 a.m., Person #1 PHONE connects to a cell tower in West Philadelphia and is traveling northbound. At approximately 2:57 a.m., Person #1 PHONE connects to a cell tower in North Philadelphia. At approximately 3:10 a.m., Person #1 PHONE connects to a cell tower that covers the area of 4600 Roosevelt Boulevard (Scene 6). At approximately 3:57 a.m., Person #1 PHONE again connects to a cell tower that covers Scene 6. At approximately 4:10 a.m., Person #1 PHONE connects to a cell tower that is nearby, but west of Scene 6. At approximately 4:57 a.m., Person #1 PHONE is again connecting to a cell tower that covers Scene 6. At approximately 5:10 a.m., Person #1 PHONE connects to a cell tower that is nearby, but northwest of Scene 6. At approximately 5:29 a.m., Person #1 PHONE is away from Scene 6, in the West Philadelphia area.

CONCLUSION

81. Based on the information provided above, I submit there is sufficient probable cause to believe that from on or about October 27, 2020, through on or about March 2, 2021, defendants Kamar Thompson, Cushmir McBride, and Person #1, known to the United States Attorney, conspired and agreed with others to use explosives to damage property which affects interstate commerce, in violation of Title 18 U.S.C. § 844(n).

/s Joseph Mangoni
Joseph Mangoni
Special Agent
Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Sworn to and subscribed
before me at 3:24 p.m., this 19th day
of March, 2021

/s Timothy R. Rice
Honorable Timothy R. Rice
U.S. Magistrate Judge